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March 15, 2006

Mr. Steve Maybury
New Jersey Department of Environmental Protection
Site Remediation & Waste Management
Division of Remediation Management and Response
Bureau of Northern Case Management
401 East State Street, 5th Floor
Trenton, New Jersey 08625-0028

Subject: Response Plan

**Reference: Edgewood Property Site – Laurelton Mobile Home Park Township of
Brick, Ocean County, NJ**

Dear Mr. Maybury

On behalf of Ford Motor Company, Tetra Tech is submitting the attached Response Plan for the removal of crushed concrete material from the Laurelton Mobile Home Park property in Brick, New Jersey. This plan incorporates the specific requirements as outlined in the NJDEP Administrative Order issued to Ford Motor Company (Ford) on March 8, 2006 (EA ID #: PI V1166).

All information in this Plan concerning the crushed concrete on the Laurelton Mobile Home Park site, including the origin of that crushed concrete, was obtained from EPI and/or from discussions with its employees, agents, and contractors. Other than sample data obtained by Tetra Tech or visual data collected by Tetra Tech employees, Tetra Tech has relied on this information in drafting this Response Plan.

This plan details the removal and disposal of crushed concrete material currently located on the Laurelton Mobile Home Park site that was reportedly transported from the former Ford Edison Assembly Plant property located at 939 U.S. Highway Route 1 in Edison, New Jersey by Edgewood Properties Inc. (EPI). This Response Plan addresses the following major elements:

1. Identify and remove material, and dispose material at an approved disposal facility.
2. Implement and maintain dust control measures including air monitoring

3. Provide disposal tracking logs and documentation for the crushed concrete materials removed from the Laurelton Mobile Home Park property.
4. Collect and analyze "post-excavation" samples from the soil located below the removed material to insure that no material is left at the site.
5. Submit progress reports to the NJDEP.

Ford intends to dispose these materials at the following permitted facility: MCUA Middlesex County Landfill in East Brunswick, New Jersey. If necessary to meet the timing set forth in this Plan, Ford also proposes to use BFI Conestoga Landfill in Morgantown, Pennsylvania. The sampling will be performed in accordance with the NJDEP Technical Requirements for Site Remediation.

Current Summary

The property is located at 1916 Route 88, Brick, Ocean County, NJ, and consists of a mobile home community known as the Laurelton Mobile Home Park. Approximately 85 mobile homes are located in the park. According to Edgewood Properties, two truck loads or approximately 26 cubic yards of crushed concrete material from the former Edison Ford Assembly Plant was delivered to the site in June of 2005. It was further reported by Edgewood representatives that a small amount material from the crushed concrete stockpile may have been used to fill pot holes in the roadway through out the park property. The exact quantity of material used or the exact location of the pot holes filled is unknown. An inspection of the Laurelton Mobile Home Park site performed by Tetra Tech on Monday, March 13, 2006 revealed that the majority of the two truck loads of crushed concrete delivered to the site remains stockpiled. No previous sampling and analysis was performed at this location. A site map is included as Attachment 1.

Investigation and Delineation Sampling

Tetra Tech will collect one waste classification sample per every 500 cubic yards (minimum of one sample) from the crushed concrete stockpile. Five discrete grab samples from the crushed concrete stock pile will be collected to form one composite sample as per NJDEP protocol. The sampling frequency and analytical parameters are based upon the disposal requirements set by the Middlesex County Utility Authority (MCUA) landfill. The waste classification analysis consists of Total Petroleum Hydrocarbons (TPHs), Petroleum Aromatic Hydrocarbons (PAHs), Polychlorinated Biphenyls (PCBs), RCRA Characteristics, and Full Toxicity Characteristic Leaching Procedure (TCLP) Parameters. The waste classification samples will be analyzed on an accelerated basis to expedite the removal process.

A small quantity of the crushed concrete material delivered to the site by EPI may have been used in roadway repairs throughout the site. Utilizing a site plan of the property provided by Edgewood, Tetra Tech has calculated the linear feet of existing roadways that may have been impacted to be approximately one-half mile in length. Since

information is not available where the crushed material was utilized in the roadways, delineation sampling will be performed as described below.

- Areas within the roadway where visually observed concrete material is present will be excavated and the excavated material added to the existing stockpile of concrete material. Once the visually observed concrete material has been excavated, the entire stockpile will be sampled as described above.
- Delineation sampling will be performed in the existing roadway network. Assuming the total length of the various internal roads is approximately 3,000 linear feet, and an average width of 20 feet (approximately 60,000 total square feet), sampling will be performed on a 900 square foot basis in accordance with the Technical Requirements. Based on the foregoing, a total of sixty-seven (67) samples will be taken. Tetra Tech will collect one grab surficial sample (0 to 6-inches) from each 900 square foot segment of roadway. The grab sample will be submitted to the laboratory for PCB analysis on an accelerated turn-around time of one week (5 working days).
- If the laboratory analysis indicates PCB concentrations above residential standards and/or additional concrete material is noted in a section of the roadway during the sampling, the material will be removed and post-removal sampling will be performed.

Removal and Disposal Procedure

Upon completion and review of the waste classification sampling and analysis, the stockpiled crushed concrete material will be removed by Ford. The material will be transported by a licensed solid waste hauler to MCUA Middlesex County Landfill or BFI Conestoga Landfill. It is anticipated that the crushed concrete material will be transported to the landfill for use as cover material. A Tetra Tech site representative will ensure that all shipping manifests, bills of lading or any other required shipping documents have been properly completed for endorsement by Ford or Ford's appointed representative prior to trucks leaving the site. No material will leave the site without prior written approval from the NJDEP.

Dust Management Plan

All on-site activities will be conducted in a manner to minimize fugitive dust emissions. To accomplish this, the following controls will be implemented:

- All material to be removed from the site will be covered properly to prevent dust migration
- A water truck and water spray will be used to control dust during removal and loading activities. Additionally, a road sweeper will be used at the site for routine road maintenance to actively control dust emissions.

- A real-time air monitoring program will be implemented before any removal work is performed. This will include monitoring of dust in the exclusion zone, at the perimeter of the site, and for personnel working in the exclusion zone. Also, a meteorological station will be placed at the site to record information such as daily temperatures, wind speed and direction, etc.
- Prior to trucks departing the site, proper decontamination of the vehicles/equipment will take place. Ford will use a crushed stone truck pad to perform dry decontamination of all trucks prior to their departure from the site. This control will adequately address the concern for crushed concrete material leaving the site.

Ford will immediately cease removal activities at the site if any of the air monitoring action levels or other standards in the attached dust management program is exceeded. In addition, Ford will cease work if the control measures detailed in this Plan or any other provisions of the Administrative Order, regulations or law, are not being met. If this occurs, Ford will not resume work activities until the issues are resolved to the satisfaction of NJDEP.

The specific activities to be conducted for the air monitoring at the site are presented in Attachment 2.

Post Removal Sampling

In accordance with the NJDEP Technical Requirements for Site Remediation, post-excavation samples will be collected from all areas where the crushed concrete material is removed. (Bottom of excavation - 1 sample per 900 square feet; Sidewall – 1 sample for every 30 linear feet of sidewall). The post-excavation samples will be analyzed for PCBs and will be sent to Severn Trent Laboratories, which is a NJ certified laboratory. Laboratory analysis will be performed on an accelerated turn-around time of one week (5 working days). After receipt of analytical data, Ford Motor Co. will confirm PCB above the NJDEP Residential Direct Contact Soil Cleanup Criteria (RDCSCC) do not remain in the areas excavated. If contaminants exceed the RDCSCC in the areas of excavation, additional excavation will occur.

Reporting

As required in the Administrative Order, Ford will provide the following information:

- Progress reports will be submitted to the NJDEP and the designated official from Brick Township on the 1st and 16th of each month of removal activity at the site. The progress report will include a summary of activities conducted and results of air monitoring for the period being summarized.
- A final report will be issued to the NJDEP and Brick Township officials within 14 days after completion of all remedial action activities and receipt of final analytical data. The final report will include a discussion of the procedures taken to eliminate all possible exposure from the material removed and the effectiveness

of the procedures implemented to control fugitive dust emissions. The report will also include origin and disposal forms pursuant to Solid Waste Management regulations that identify all material removed from the site. This information will include the weight of material and equivalent cubic yards.

- Other reports required by the NJDEP or other significant correspondence will be provided to Brick Township.

Schedule

Ford will initiate work for the above referenced activities within 2 days after written approval from the NJDEP. Ford Motor Co. will complete remedial action activities within 30 days after approval of this plan.

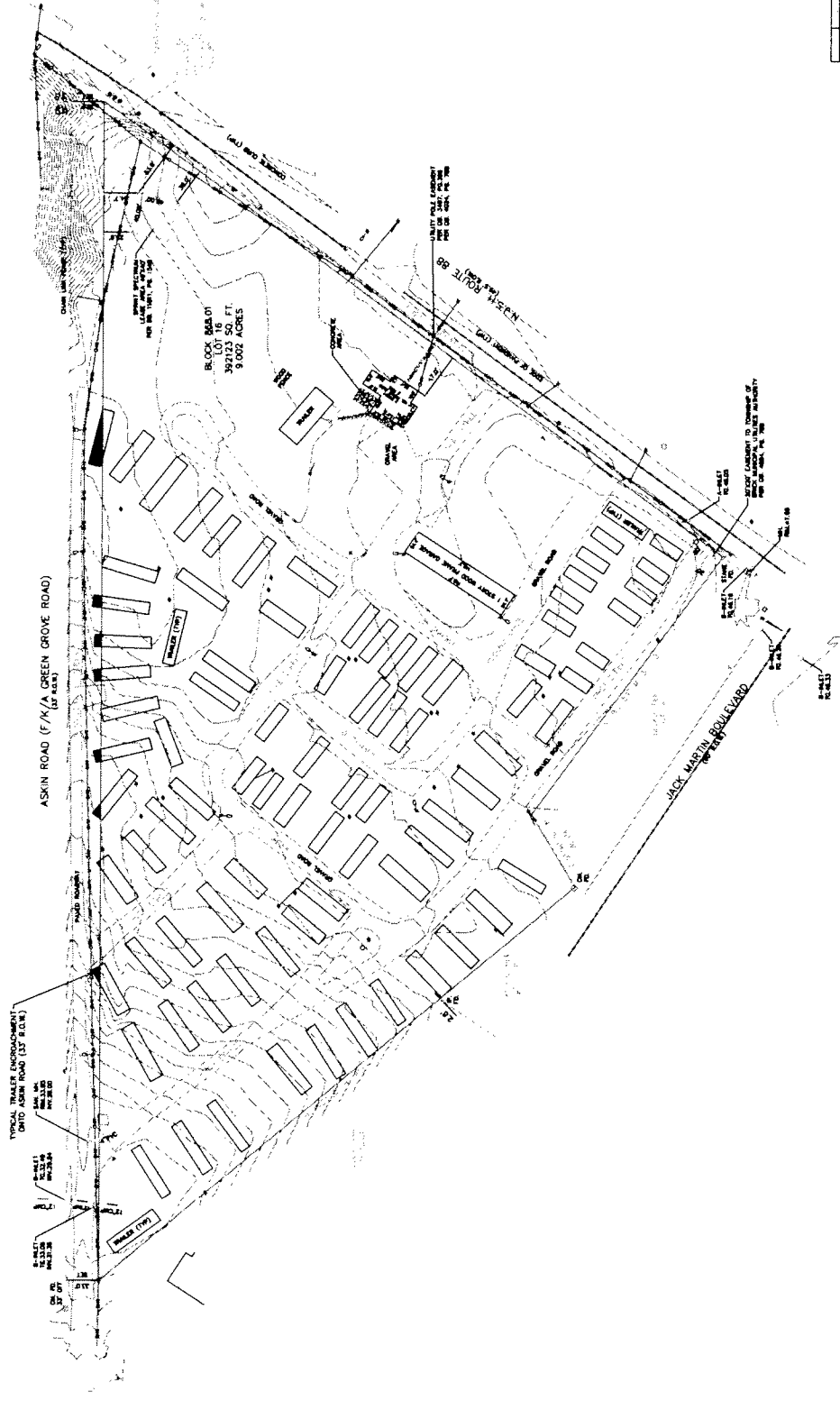
Ford Motor Company will notify you prior to the start of any on-site activities and immediately if there are any changes to the schedule. If you have any questions, please contact me at 973-659-9996, extension 231.

Sincerely,

A handwritten signature in black ink, reading "Douglas Sullivan", with a horizontal line above it.

Douglas Sullivan
Senior Project Manager

ATTACHMENT 1
(Site Map)



N.T.S.

1. THIS MAP IS INTENDED TO SHOW THE FIELD AND RECORD EVIDENCE AS TO THE LOCATION OF THE TRAILER ENCROACHMENT.
2. ONLY COPIES FROM THE RECORDS OF THE COUNTY CLERK'S OFFICE SHALL BE CONSIDERED VALID FOR THE PURPOSES OF THIS MAP.
3. THE TRAILER ENCROACHMENT IS SUBJECT TO SUCH STATE OF FACT AS MAY BE DETERMINED BY THE COURT.
4. THIS MAP CANNOT BE USED FOR THE PURPOSE OF PLACING OR REMOVING ANY ENCROACHMENT WITHOUT THE WRITTEN PERMISSION OF THE COURT.
5. THE PLANS CANNOT BE USED FOR THE PURPOSE OF PLACING OR REMOVING ANY ENCROACHMENT WITHOUT THE WRITTEN PERMISSION OF THE COURT.
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- COMBINED LINES
- FENCE LINE
- WATER LINE
- GAS LINE
- LIGHT ON UTILITY POLE
- SMALL LIGHT
- BIKE
- TELEPHONE CABLE
- CABLE
- SATELLITE ANTENNA
- POLE
- GAS VALVE
- GAS METER
- ELECTRIC BOX
- WATER VALVE
- FURNACE
- UTILITY POLE
- TREE



ALL LOTS ARE SUBJECT TO THE TRAILER ENCROACHMENT. THE TRAILER ENCROACHMENT IS SUBJECT TO SUCH STATE OF FACT AS MAY BE DETERMINED BY THE COURT.

IN THE CITY OF JACKSON, MISSISSIPPI, I, THE CLERK OF THE COUNTY CLERK'S OFFICE, DO HEREBY CERTIFY THAT THE ABOVE MAP IS A TRUE AND CORRECT COPY OF THE MAP AS IT APPEARS IN THE RECORDS OF THE COUNTY CLERK'S OFFICE.

DA

NO.	DATE	BY
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2		
3		
4		
5		
6		
7		
8		
9		
10		

DATE: JAN. 17, 2000
FILE: 200000
DRAWN: JDS
CHECKED: JDS
SCALE: 1" = 50'
SHEET: 1 of 1

ATTACHMENT 2
(Dust Management Plan)

DUST MONITORING PLAN

EXCLUSION ZONE MONITORING:

Purpose: Evaluate release of dust in zones to determine proper dust control measures.

- Exclusion zone (where work activities will occur) will be established.
- PDR-1000 Dust monitors will be located downwind at the perimeters of the exclusion zones.
- Action levels to implement dust control will be sustained readings (5 minutes) above 5 mg/m^3 .
- Visual assessment of dust levels will be used to implement dust control.
- Dust control measures shall be water or dry agents during cold weather and shall be on-site at all times.

PERIMETER MONITORING:

Purpose: To identify and control off-site dust emissions.

- Determine strategic perimeter sampling locations based on wind direction, on-site operations, neighboring properties, public thoroughfares, and NJ DEP concurrence.
- DR-4000 respirable particulate monitors (PM-10) with omni-directional inlets will be used to measure levels of respirable dust at perimeter of the property.
- Action levels to implement dust control or to trigger monitor for specific contaminants of concern (i.e. PCB's) will be sustained readings (15 minutes) above 150 ug/m^3 as identified in the National Ambient Air Quality Standards (NAAQS). (See Attachment A-NAAQS Standards)

PERSONAL MONITORING:

Purpose: Evaluate worker exposure during normal work activities to be able to wear appropriate PPE.

- Determine personnel exposure of worker.
- Monitoring for total dust.
- Use pre-weighed filter cassettes and a low flow pump for dust sampling. (See Attachment B-Sampling Methods)
- Action level to implement upgrade of personal protection equipment (PPE) for dust is 15 mg/m^3 .

Based on the low levels of PCB's (Generally 2 ppm) the action level for dust that would trigger PCB concerns and monitoring is estimated at 500 mg/m^3 *. If this action level is exceeded monitoring for PCB's will require the following:



- Use sorbent tube and low flow pump for PCB sampling. (See Attachment B-Sampling Methods)
- Action level to implement upgrade of personal protection for PCB's is 0.001 mg/m³ for the National Institute for Occupational Safety and Health (NIOSH) and 1 mg/m³ for the Occupational Safety and Health Administration (OSHA). Tetra Tech recommends using the NIOSH standard as an action level for upgrading PPE.

****Formula to correlate PCB levels in soil to dust levels is:***

(Calculation: Convert PCB soil levels to a fraction (2 mg/kg = 0.000002) and multiply by the particulate concentration). For example if the particulate concentration is at 500 mg/m³ then the concentration of PCB in air is 0.001 mg/m³, which is the REL.

METEOROLOGICAL STATION:

Purpose: To record weather conditions related to the site.

- Determine location of METSTATION.
- Record daily the temperature, relative humidity, barometric pressure, wind speed and direction.
- Assess this information and correlate with particulate monitoring results.

REPORTING:

Purpose: To ensure communications between all parties.

- Progress reports will be submitted to Ford prior to the 1st and 16th of each month. Ford will issue reports to the NJDEP and municipal officials in accordance with the Administrative Order EA ID #: PI V1166.
- Progress reports will summarize results of the perimeter monitoring and meteorological information during that period.
- Final report will be generated at the end of the project and will include all perimeter monitoring results, meteorological information, and field documentation logs ensuring the effectiveness of the dust management plan. Ford will issue reports to the NJDEP and municipal officials in accordance with the Administrative Order EA ID #: PI V1166.

CONCLUSION:

Monitoring of dust levels will take place prior to removal activities, during removal activities, and after removal activities are complete.



ATTACHMENT A
(NAAQS Standards)



National Ambient Air Quality Standards

POLLUTANT	STANDARD VALUE *		STANDARD TYPE
Carbon Monoxide (CO)			
8-hour Average	9 ppm	(10 mg/m ³)	Primary
1-hour Average	35 ppm	(40 mg/m ³)	Primary
Nitrogen Dioxide (NO₂)			
Annual Arithmetic Mean	0.053 ppm	(100 µg/m ³)	Primary & Secondary
Ozone (O₃)			
1-hour Average	0.12 ppm	(235 µg/m ³)	Primary & Secondary
8-hour Average	0.08 ppm	(157 µg/m ³)	Primary & Secondary
Lead (Pb)			
Quarterly Average	1.5 µg/m ³		Primary & Secondary
Particulate (PM 10) <i>Particles with diameters of 10 micrometers or less</i>			
Annual Arithmetic Mean	50 µg/m ³		Primary & Secondary
24-hour Average	150 µg/m ³		Primary & Secondary
Particulate (PM 2.5) <i>Particles with diameters of 2.5 micrometers or less</i>			
Annual Arithmetic Mean	15 µg/m ³		Primary & Secondary
24-hour Average	65 µg/m ³		Primary & Secondary
Sulfur Dioxide (SO₂)			
Annual Arithmetic Mean	0.030 ppm	(80 µg/m ³)	Primary
24-hour Average	0.14 ppm	(365 µg/m ³)	Primary
3-hour Average	0.50 ppm	(1300 µg/m ³)	Secondary

* Parenthetical value is an approximately equivalent concentration.

ATTACHMENT B
(Sampling Methods)





SKC Home
Homeland Security

Guide to OSHA/NIOSH/ASTM Air Sampling Methods

Contact SKC

Dust total nuisance

Search

Products

Chemical Hazard: Dust total nuisance

Ordering

Agency Reference: OSHA CSI

What's New

Customer Service

Agency Standards

Rentals

TWA (ppm): 15 mg/m³

Downloads

Sales & Service

Sample Volume (liter)

Email Newsletter

TWA: 720

Catalog Request

Sampling Help

Sampling Rate (ml/min)

Sampling Guides

TWA: 1500

Laboratories

Links

Sampling Time

About SKC

TWA (hours): 8

Events / Seminars

Site Map

Analytical Method: GR – Gravimetric Analysis

SKC Equipment: Filter 225-8-01SC
Filter Cassette and Cyclone Holder 225-1
Filter Cassette 225-2LF

Footnotes: CSI-OSHA Chemical Sampling Information (OSHA CD-ROM)

Chemical Hazards by First Letter



SKC Home
Homeland Security
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What's New
Customer Service
Rentals
Downloads
Sales & Service
Email Newsletter
Catalog Request
Sampling Help
Sampling Guides
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Links
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Site Map

Guide to OSHA/NIOSH/ASTM Air Sampling Methods

Polychlorinated biphenyls

Chemical Hazard: Polychlorinated biphenyls

CAS Number: 1336-36-3

Agency Reference: NIOSH 5503

Agency Standards

TWA (ppm): 0.001 mg/m³ (10 hr)

Sample Volume (liter)

TWA: 48

Sampling Rate (ml/min)

TWA: 100 (200)

Sampling Time

TWA (hours): 8 (4)

Analytical Method: GC-ECD -- Gas Chromatography-Electron Capture Detector

SKC Equipment: Filter 225-16
Filter Cassette 225-32
Sorbent Tube 226-39

Limit of Detection: 0.03 µg/sample

LOD Note:

The policies of the AIHA laboratory accreditation committee require that method detection limits must be established and